

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

KIMBERLY TRENT,

Plaintiff,

v.

LEAH HUFFMAN,

Defendant.

CASE NO. 6:17-cv-01906-MC

**AMENDED PROPOSED
JOINT PRETRIAL ORDER**

INTRODUCTION

The parties have conferred regarding the Pretrial Order. This Pretrial order is being submitted in accordance with the Court's Order of January 31, 2023 and Local Rule 16-5.

NATURE OF THE ACTION

Plaintiff Kimberly Trent brought this action seeking damages for personal injuries she allege were sustained as the result of a motor vehicle collision that occurred on September 5, 2016 on Interstate 5 near Woodburn, Oregon. Plaintiff Kimberly Trent seeks both economic and noneconomic damages.

The parties have requested a jury trial.

JURISDICTION

This Court has jurisdiction under 28 U.S.C. § 1332, as this is a civil action in which the matter in controversy exceeds the sum or value of \$75,000, exclusive of interests and costs, and is between citizens of different states.

AGREED FACTS

1. On September 5, 2016, Plaintiff was traveling southbound on Interstate 5 in Woodburn Oregon.
2. Plaintiff's vehicle was a 2007 Chevrolet HHR manufactured and sold by General Motors.*
3. A collision occurred between Plaintiff and Defendant's vehicle in which Plaintiff's vehicle was struck from behind by Defendant's vehicle and pushed into another vehicle
4. At the time of the collision, Plaintiff was employed by Bechtel as a Document Control Specialist.
5. At the time of the collision, Plaintiff's annual base salary at Bechtel was \$47,244.
6. Plaintiff settled her claims against General Motors, LLC with no party admitting fault.*

CLAIMS AND DEFENSES

Plaintiff Kimberly Trent contends as follows:

1. As a result of Ms. Huffman's negligence, Plaintiff sustained physical injuries as a result of the subject collision.
2. As a result of Ms. Huffman's negligence, Plaintiff has incurred medical expenses and will incur additional medical expenses in the future as a result of the injuries she sustained in the subject collision,
3. As a result of Ms. Huffman's negligence, Plaintiff has sustained income loss and will incur additional income loss in the future as a result of the injuries she sustained in the subject

collision,

4. As a result of Ms. Huffman's negligence, Plaintiff has sustained damages and will sustain additional damages in the future for pain and suffering, disability, loss of enjoyment of life and other non-economic damages as a result of the subject collision.

Defendant Leah Huffman contends as follows:

1. Defendant denies the extent of Plaintiff's alleged injuries and damages.

OTHER LEGAL ISSUES

At this time, none. However, the parties plan to raise issues regarding the admissibility of evidence in their pre-trial Motions in Limine.

DATED 3rd day of March, 2023.

/s/ Joseph A. Grube
JOSEPH A. GRUBE
Attorney for Plaintiffs

/s/ Glenn E. Barger
Glenn E. Barger
Attorney for Defendants